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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NOVARTIS CORPORATION,
NOVARTIS PHARMACEUTICALS
CORPORATION and
NOVARTIS INTERNATIONAL AG,

Plaintiffs,

v.

TEVA PHARMACEUTICALS USA, INC.

Defendant.

NOVARTIS CORPORATION,
NOVARTIS PHARMACEUTICALS
CORPORATION and
NOVARTIS INTERNATIONAL AG,

Plaintiffs,

v.

WATSON LABORATORIES, INC., and
WATSON PHARMACEUTICALS, INC.,

Defendants.

Civil Action No. 04-04473 (HAA)(ES)
Lead Case

Civil Action No. 06-01130 (HAA)(ES)

Declaration of Alex Gorsky

DECLARATION OF ALEX GORSKY

I, ALEX GORSKY, declare as follows:

1. I am Chief Executive Officer of Novartis Pharmaceuticals Corporation. I submit this declaration in support of Novartis Corporation, Novartis Pharmaceuticals Corporation, and Novartis International AG's (collectively, "Novartis") Application for a Temporary Restraining Order. I have personal knowledge of the following recited facts and if called as a witness would competently testify as follows.

2. Lotrel[®] is Novartis' second-largest selling drug product in the United States. Sales in 2006 were approximately \$1.4 billion.

3. The launch of a generic version of Lotrel[®] in violation of Novartis' patent rights would cause immediate, substantial, and irreparable damage to Novartis. Novartis would quickly lose significant sales and market share and face irreversible price erosion.

4. Novartis has heard rumors that Teva is offering a one-year supply of generic Lotrel[®] to its customers. Once these products arrive at wholesalers, they are nearly impossible to recall.

5. If a generic manufacturer floods the market with even a few months' worth of supply, little to no market will be left for Novartis' branded Lotrel[®] products because the supply channels will be flooded and it will be impossible for Novartis to recover its price.

6. I have seen the "New Item Set-Up Sheets," as they are known in the trade, provided by Teva to at least one of its major customers. Teva appears to be offering its generic Lotrel[®] at substantially lower wholesale prices than Novartis.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 19, 2007



Alex Gorsky